

February 25, 2022

California Citizens Redistricting Commission
721 Capitol Mall, Suite 260
Sacramento, CA 95814
Sent via electronic transmission

Re: Lessons Learned, Reflections, and Recommendations

Dear Members of the California Citizens Redistricting Commission,

Our organizations and the communities we represent express our deep thanks for the tireless, dedicated work each of you put in to complete California's state redistricting process. With redistrictings across the country currently entangled in scandal and litigation, the highly public, highly participatory, and litigation-free process you led in California stands as a nationwide highlight. You achieved this under difficult circumstances, from the delay of Census Bureau data and the resulting legal uncertainties to a COVID-imposed mandate to engage and hear from almost 40 million California residents in entirely remote/virtual formats. You were nimble, adaptable, and innovative in the face of sometimes enormous hurdles. Congratulations on everything you have accomplished.

We know well how much time and effort went into making sure the California Citizens Redistricting Commission (CRC) would be viewed by the California public as trustworthy and credible and into making sure the process was accessible and responsive. While the process had some bumps along the way, those goals were accomplished. As you embark on a "lessons learned" journey to help the 2031 CRC lead an even better process in ten years, we contribute the comments and suggestions you will find below.

We touch on a very wide range of topics, and not every signatory to this letter agrees with every letter of every suggestion. Nevertheless, this document contains our collective reflections at this early stage. Please treat them as food for thought in your discussions. Over the course of 2022, some subsection of our group will be doing deeper study and analysis on the CRC's work and seeking the views of a wide range of stakeholders, including yourselves. More and more refined recommendations are likely to come out of that process.

We hope the suggestions below are helpful. They are offered with enormous respect for your efforts. Please feel free to reach out to Jonathan Mehta Stein (jstein@commoncause.org) at California Common Cause, Helen Hutchinson (hhutchison@lwvc.org) at the League of Women Voters of California, or Deanna Kitamura (deannak@advancingjustice-alc.org) at Asian Americans Advancing Justice - Asian Law Caucus to follow up.

Thank you again for all of your work.

Sincerely,

AAPIs For Civic Empowerment Education Fund
Advancement Project California
Asian Americans Advancing Justice - Asian Law Caucus
Asian Americans Advancing Justice - Los Angeles
Bay Rising
California Black Power Network (formerly CA Black Census & Redistricting Hub)
Community Coalition
California Common Cause
Inland Empire United
League of Women Voters of California
NALEO Educational Fund

Selection Process

KEEP/MODIFY:

- The State Auditor's Applicant Review Panel skillfully constructed a pool of finalists that included a strong, diverse set of skills and that was broadly representative of the State of California, despite the lack of representation in the applicant pool among certain communities.
- Before and during the next application period, the current Commissioners and the Auditor's Office should increase outreach by the State to a wide range of diverse communities, in order to increase the diversity of the applicant pool.
 - This outreach should start as early as 2028, and could be integrated with the outreach done for the 2030 Census.
 - The State's outreach efforts should partner with civic leaders and organizations in underrepresented communities.
 - The Auditor's Office, which capably fills many roles in the application process, may need support and partnership from other parts of state government to do outreach work well. It may be wisest for the Commissioners themselves to lead the outreach work.
- The State Auditor's Applicant Review Panel needs to be aware that appreciating California's diverse communities includes appreciating the work that organizations rooted in those communities do to engage them, uplift them, and advocate with and for them. This should be incorporated in the Applicant Review Panel's thinking as they evaluate candidates.

DELETE/ADD:

- The application process needs to ensure Commissioners have the time and willingness to commit to the full process. One approach to addressing this would be to have the Applicant Review Panel lay out the time commitment clearly in interviews and ask each applicant to confirm that the time commitment is manageable.

- The Applicant Review Panel should ensure that some significant number of the finalists have strong process-oriented and group-management skills. Managing the CRC requires building and managing a huge number of systems, processes, and protocols, and doing so quickly. It also requires skillful management of a group composed of 14 unique, dynamic, and highly experienced individuals. The selection process should unearth people with the appropriate experiences and skills for these tasks.

Onboarding/Training

KEEP/MODIFY:

- The specific subject trainings on the laws related to redistricting were excellent.
- The training and onboarding of the commissioners could have been better organized. It would have helped to start with a big picture introduction about the CRC's work and what will be covered in the various trainings. Additionally, the next CRC should get early information about organizing themselves as a commission, followed by legal requirements about their work, including Bagley-Keene. The Commissioners can then make basic decisions about their internal organization. Once organized, the training schedule can move on to the substantive work of the CRC. That substantive training should start with the VRA and should include specific training on COI and a geography component.
- The CRC should consider including a mock line-drawing session as part of the training as early as possible. This could even occur before the official line-drawing consultant is hired. This will allow Commissioners to ask themselves vital questions: What data analysis is required? What balancings and hard choices are part of the process? Here are some suggestions for the new CRC:
 - Use the COI and data from the 2021 cycle and try mapping some specific areas.
 - Do at least two exercises. Start with an easy area and then move to a more complex area that includes multiple overlapping communities as well as communities covered by the Voting Rights Act.
- Training should continue to include information about Community of Interest testimony. The training should include that, when making decisions about COIs, Commissioners should prioritize testimony received over their own knowledge/experience.
- In addition to the written reports from the previous Commission, the next CRC should increase the in-person contact with former Commissioners to allow new and former Commissioners to interact, ask questions, and build relationships for future discussions.
- Commissioners should receive additional training about how to make outreach more effective. While this is "old hat" for some Commissioners, it is new to others. The training should continue to include presentations provided by community-based organizations representing a wide-array of population groups.

DELETE/ADD:

- The 2031 CRC should add training specifically about meeting facilitation. This should include:
 - Legal requirements for running meetings

- Ensuring all Commissioners are heard and have a chance to participate
 - The role of staff in public meetings
 - Best practices for facilitating discussion and meetings
 - Managing and ensuring public comment is consistently opened as scheduled
- In onboarding, future Commissioners should have a discussion specifically about attendance expectations and hopefully develop some hard requirements.
 - The onboarding should include training that state law empowers the Governor to remove a Commissioner when necessary.
 - In order to keep Commissioners accountable to the public, there should be a requirement that the chair or staff announce when Commissioners enter or leave a meeting.
- Future Commissioners should be trained/educated about hiring requirements under state law. Some positions are governed by specific state requirements and in those cases the CRC has no discretion about job descriptions; that should be known to Commissioners early on.
- Commissioners should be trained/educated about state rules around subgranting for public outreach.
- Commissioners should be trained to listen for astroturf¹ efforts and anonymous callers who are fronts for candidates and parties. Former Commissioners (i.e. yourselves) could be especially helpful in this training.
- The CRC should have a training and discussion on the appropriate balance of Commissioner and staff roles, including discussion on when staff should be in control and should be empowered to push work forward. For example, former Commissioners could give advice on when to defer to staff on issues that can be handled outside of public meetings. Additionally, training and former Commissioners should identify things the new Commissioners simply will not have the time to do and should leave to staff.
- The training and on-boarding should include a list of everything the CRC will have to complete, so Commissioners understand the magnitude of what they have to do and budget time appropriately.

Hiring of Staff

KEEP/MODIFY

- While the hiring of consultants and counsel was transparent, the hiring of the Executive Director was not. Had it been transparent, the former Commissioners and public could have provided insight on the CRC's initial selection. (Generally speaking, we would recommend the 2031 CRC speak to the 2021 CRC for references on job seekers who worked for the 2021 CRC.)
 - The CRC should conduct the final interviews of candidates for ED in public.

¹ Astroturf: To mask the true source of a message to make it appear as though it originates from and is supported by grassroots participants. It is a practice intended to give the statements or organizations credibility by withholding information about the source's financial connection.

- While the 2021 CRC had data management support, the next CRC should consider hiring additional capacity in this area to ensure that the website is updated quickly and consistently, especially during mapping periods.
- The CRC should empower staff by:
 - Expecting top staff to give concrete advice and manage the implementation of policy set by the CRC.
 - Hiring a chief counsel who has extensive experience in implementing the Bagley-Keene Act.
 - Giving staff clear guidance on what the role of staff is versus what the role of the Commissioners is.
 - Giving staff the additional responsibility and freedom to get their jobs done, where appropriate. Senior staff should not be making major decisions around policy, but operational staff (outreach specialists, comms specialists, etc.) should be given the freedom to do their jobs properly.

DELETE/ADD:

- The CRC is required to hire certain categories of staff whose job descriptions are strictly proscribed by state law (e.g. budget officers, contract monitors, etc.). Commissioners need to understand where their flexibility is limited and hire these staff early without extended discussion of alternatives. To expedite the hiring of proscribed positions, the State Auditor could post job descriptions on the website so that an applicant pool exists when the ED is hired.
 - This should be limited to positions where CA law is highly prescriptive. This does not include the positions of the ED, communications director, general counsel, outreach manager, etc.
- The CRC should look at the state's census staff for potential applicants for key staff positions.
- Hiring of experts is strictly bound by state rules on contracting. The Commissioners need to be educated about the specifics of the state rules on hiring early so that they can get job postings up in a timely manner.
- The current CRC should create templates for job descriptions for senior staff -- ED, chief counsel, communications, outreach – to be used by the next Commission. A list of the duties/responsibilities of each position, along with desirable qualities, could assist future Commissions in hiring without having to completely reinvent the wheel each time.
 - The State Auditor should not write or post job descriptions for these senior-level positions. That is a role appropriately left to Commissioners.
- The position of Deputy Director was created in this cycle. But when the Deputy Director moved up to ED, the position was not filled. Is the position necessary? Could the responsibilities envisioned for the job be redistributed among other staff?

Hiring of Consultants

KEEP/MODIFY

- We believe the CRC succeeded in meeting its timeline, in part, because it hired Q2, a mapping company that is well-respected and well-resourced and has decades of experience.
- Rigorous investigation of contractors is a good thing but the RFP process should not be so laborious that it yields only one or two applicants for each role.
 - We suggest working with the mapping contractors to create a template RFP for mapping services for the next Commission.
- The CRC should bring the communications contractor on earlier than it did in 2021 to do publicity and community education earlier. While we understand the need to perhaps conduct some community education during the COI input process, most of the outreach and education should be completed before the COI hearings begin.
- The CRC should hire VRA counsel and the RPV analyst earlier in the process than was done this time.

DELETE/ADD

- The CRC should consider whether it should seek a legal exemption from California's hiring and contracting provisions.

Transparency

KEEP/MODIFY

- CRC subcommittees created rich opportunities for Commissioners to take lead on a multitude of issues and processes, which in many instances led to robust proposals and frameworks. In order to ensure effective and transparent subcommittee structures and processes, it will be imperative to:
 - Ensure adequate report-backs are provided to the public, including on key decisions made and how information gathered and conversations held with community stakeholders informed a decision.
 - Create report-backs that either provide specific recommendations or a structured set of options for the full CRC to consider.

DELETE/ADD

- The CRC should be clear about (1) what constitutes "redistricting matters" and (2) the policies and practices all subcommittees will abide by in order to ensure compliance with the Bagley-Keene Act and to ensure transparency for and accountability to the general public.
 - Subcommittees should publish agendas ahead of their meetings, as an additional mechanism for greater transparency and public accountability.
 - The CRC should consider allowing some kind of public access to meetings lawfully held out of public view because they do not pertain to the CRC's definition of "redistricting matters" -- for example, audio-record them and post them on the CRC's website.

- Subcommittees that oversee critical issues, such as legal issues and public input design, should hold all their meetings publicly. This will enable greater transparency on important matters and better inform the public to engage and provide helpful feedback to the CRC.

General Process

KEEP/MODIFY

- The 2021 CRC generated enormous volumes of public participation, including verbal testimony, written and email input, map submissions, and so on. Centering the public in the state's redistricting process is one of the goals of the CRC, and that was achieved.
- Outreach and public engagement were a trademark of the CRC, resulting in innovative approaches and tactics that enhanced public participation. This was especially the case once the CRC was fully staffed, outreach plans were finalized, and actions implemented that brought insights into areas needing change and/or improvement.
 - We believe the CRC's outreach and education planning benefited from the educational presentations by diverse community stakeholder representatives. Those presentations allowed the CRC to deepen its understanding of the barriers, unique circumstances, and historical and socio-political context that shape various communities' abilities to participate in our democracy.
 - Having a wide variety of communication materials, such as flyers, info-sheets, videos, social media toolkits, and outreach toolkits was helpful to groups doing community outreach and education.
 - In order to build upon the CRC's efforts for future redistricting cycles, outreach can be further maximized by:
 - Beginning outreach as early as possible to inform the public on the upcoming redistricting process, including front-loading public-facing collateral, such as billboards, flyers, radio ads, informational material online, etc.
 - Completing translation of informational material, website, and social media content prior to the launch of public outreach.
- Public meetings and hearings were one of the primary vehicles through which the public stayed informed on the redistricting process. Providing a clear schedule to the public with adequate information will be critical in future cycles. This includes:
 - Providing a consistent CRC meeting schedule and updated calendar of meeting dates, especially as it pertains to regional discussions so members of the public know when their region is being discussed.
 - Posting a clear schedule of chair rotation for the public to know who will be chairing when.
 - Indicating the difference between general public comment and public comment on specific agenda items.

- Offering the public interpretation services in various languages was key for public engagement; adopting Spanish interpretation to be part of all the meetings was particularly helpful.

DELETE/ADD

- Outreach
 - Given California's large geography and population diversity, no 14-member body can conduct an adequate outreach and education program by itself. The CRC should hire outreach specialists, especially those who know the hard-to-reach communities. At the same time, the CRC should also establish formal partnerships with CBOs and other trusted community messengers and provide them with funding support to lead outreach efforts across the state and/or regions. We recognize that this was an original intent by the current Commissioners that unfortunately met with many bureaucratic challenges. We strongly believe it is worth implementing in future cycles.
 - Working alongside trusted messengers across diverse communities will further maximize public participation and reach a greater number of residents more effectively by leveraging their existing community infrastructures and networks. It is important to recognize that this is valuable work that requires adequate resources to enable community partners to educate, engage, and mobilize residents, especially from underrepresented communities, for a robust public participation in the redistricting process.
- Playbook
 - The CRC should include social justice and equity as a criteria to guide the approach on how to balance competing COI testimony and assess the impact that line-drawing choices will have on underrepresented communities' ability to elect candidates of choice.
- Commissioner Participation
 - The CRC should develop rules about Commissioners who repeatedly do not participate and/or attend meetings and set thresholds for triggering intervention, removal proceedings, or other measures, if necessary.
- CRC Policies
 - The CRC should ensure their policies are constantly updated and set in writing on the website.
- Public Comment
 - The CRC should set and respect times for public comments at meetings.
- Voting on a Motion
 - All motions should be posted and easy to find, if not in real time, immediately after the meeting in which they are voted on.

Website

KEEP/MODIFY

- The CRC's Map Viewer was vital, especially for those who did not have access to mapping software. In the future, it will be crucial to have something similar so the general public can view the proposals.
- Airtable as a single place to have all input was a strong idea. A few things, like the community mapping proposals and some COI maps, were missing, but it was generally good and a smart concept.
 - It seemed that how the CRC received some information determined whether it was added to Airtable. All public input about maps – no matter how it is received – should be available in a single place.
 - The website should include all pertinent information in any adopted database. AirTable was adopted after public input had already been received, and the database did not include that early COI testimony.
- The website should be a way the general public can understand actions the CRC took or plans to take. Unfortunately, the website was not searchable. In order to find a policy or handout, the public had to find the meeting in which the item was discussed, and then determine what if any changes were made to the handout by the full CRC.
 - The CRC's website should be easily searchable and useful to three audiences: (1) the public, (2) Commissioners, and (3) Commission staff.
 - Because of the importance of the website to the general public, the CRC should always have adequate staff who can dedicate time to the website and to organizing documents on it.
- The CRC should make it clear to staff that **everything** needs to be posted. A system should be developed to ensure consistency in how items are tagged and where they are posted. We are attaching a letter submitted previously on website improvements and data management.

DELETE/ADD

- All key documents on the website should be in one place – a single page or tab – including the date and status (draft/final) of each. Both draft and final versions of documents should be kept on the website. Documents that should be included: (1) CRC policies, (2) meeting handouts, (3) meeting presentations, and (4) subcommittee reports.
- In order to ensure that the public can follow the actions and progress of the CRC, CRC staff should:
 - Post map updates within 24 hours of the meeting.
 - Post meeting summaries (i.e. summaries of actions taken, not minutes) within 24 hours of a meeting.
 - Post any map that is voted on prior to the vote.
 - Upload all map iterations and proposals being discussed to the Map Viewer, and as a shape and block equivalency files, at least 24 hours in advance, to allow the public to zoom in and review the details of map proposals.
 - Include all proposals on the Map Viewer when Commissioners are considering multiple proposals, include all proposals on the Map Viewer.

- The CRC should ensure continued maintenance and security updates for the website going forward so that the public continues to have full access to past records as well as the ongoing work of the CRC.
- The CRC should post videos of their mapping meetings immediately after each meeting ends. For this cycle, a third party's YouTube channel posted videos for the public. It allowed those who knew about the link to watch segments of meetings they missed or wanted to rewatch. However, the general public may not have been aware of the third party's channel. In order for everyone to have equal access to the meetings, the CRC should quickly post videos of its own meetings.

COI and Public Map Proposals Input Process

KEEP/MODIFY

- Virtual hearings, necessitated by the COVID public health crisis, were very important to improving public access. We encourage the CRC to continue to offer virtual access in the future, using a hybrid of in-person hearings accompanied by virtual viewing and participation. If the CRC is not permitted to hold virtual hearings or hybrid hearings in the future, the CRC should make it easy for the public to participate by holding input hearings across the state.
- The online public input form was helpful and made it easy for members of the public who could not call into hearings to submit their feedback to the CRC.
- The COI mapping tool was helpful and allowed community members to map their communities for the CRC.
- The COI input form was a good way for the public to provide information to the CRC regarding their COI.
 - The form included a drop down menu of factors that was long and confusing. It was unclear whether the Commissioners reviewed the selected factors in a given COI submission. If they were not reviewed, the form should not include the factors. If they were reviewed, the factors should be pared down and not overlap.
- The call-in process for the COI input meetings was fairly effective. It was good that appointment slots were provided within a 90-minute window, so that members of the public did not need to wait in a queue for multiple hours. However, the process for calling in was somewhat complicated and some community members had difficulty navigating zoom and knowing when to speak.
- The Commission should create a system that allows speakers to submit follow-up documents. For example, some people called in to describe a COI but wanted to submit a map later. We recommend creating a way for speakers to link a document before their appointment and after their appointment if needed.
 - Ideas to achieve this include creating a unique submission email for people with appointments, allowing people to attach an image when they register for an appointment, and/or sending a follow-up email after people speak inviting them to provide follow-up documentation.

- We believe providing individuals and community groups the opportunity to present their mapping proposals benefits the CRC by showing alternative mapping ideas and should always be part of the redistricting process.
 - However, the process for the public map proposal meetings was unclear and could use improvement. Organizations were given different numbers of slots and different lengths of time, despite presenting similar levels of content.
 - Additionally, people presenting statewide map proposals across multiple levels of government should receive more time for map presentations.
- The process for the public to submit input was inconsistent -- one form allowed the public to include attachments and one did not. The input process should be consistent.
- Data management for COI input and public map proposals should be improved.
 - The CRC should post COI input relatively quickly, whether received through email, feedback form, verbal comment, or other method.
 - COI maps and public map proposals were difficult to find and at times appeared to have been lost. Some of our organizations had to submit COIs multiple times.
 - We recommend that the CRC create a COI map repository that is easily searchable by both the CRC and the public. The CRC should then use the COI maps during line-drawing.

DELETE/ADD

- We encourage the CRC to significantly improve transcript quality and availability. We found transcripts of some, but not all speakers. We suggest that all speech should be live-transcribed through automation.
- We also encourage the CRC to improve the functionality available on the livestream video of hearings. The video should be navigable, aided by transcription. At a minimum, viewers of the video stream should be able to move backward and forward through the portions of the meeting that have already transpired. Additionally, the video transcription system should allow viewers to search for keywords and use them to navigate back in time in the video feed. The Washington State Redistricting Commission used such a system.

Mapping Process

KEEP/MODIFY

- The CRC wisely attempted to include VRA districts in its draft maps.
- The CRC was also wise to begin all levels of mapping in a VRA region.
 - All VRA regions should be mapped before moving to non-VRA regions. Instead of starting with the Central Valley and moving north to Sacramento, Southern California, with its many VRA requirements, should have been the next region of focus, if not the first.
- Map Viewer
 - Map Viewer was vital for the general public who did not have a mapping program. It was easier to understand district configurations on Map Viewer than on the PDF versions of the districts. The next CRC should use a similar mapping

- program that will allow the public to view the current map and various proposals as well as see important demographic data.
- Proposals would usually be posted as PDFs first before the districts were posted on Map Viewer. Because Map View was vital, the CRC should prioritize updating Map View rather than posting PDFs.
 - Because a mapping program like Map Viewer is essentially for the general public, it would be helpful in understanding the changes made to an entire map or district if Map Viewer had all the prior versions on it, not just the draft maps and latest configurations.
 - The CRC sensibly decided to wait to conduct visualizations until the Census data was released. Conducting visualizations beforehand would have likely resulted in early proposals that did not reflect population growth and might have biased the outcome of the final maps.
 - Racially Polarized Voting Analysis
 - A full RPV analysis should be conducted early in the process in order for the CRC to determine its obligations and to prioritize which regions to map first.
 - Detailed RPV maps should be provided to the public before the CRC's mapping discussions begin. The RPV maps were somewhat helpful, but until the more detailed maps were provided at the end of the process, it was nearly impossible to figure out all the cities that were covered. That hampered the public's ability to submit mapping proposals that either fully complied with the VRA or unnecessarily limited the way the public drew regions. Instead of a PDF, the RPV map should be in Map Viewer to allow the public to zoom into an area.
 - The CRC should ensure consistency in, transparency of, and public access to data and analysis the CRC relies on, particularly as it relates to VRA analysis and determinations.
 - If RPV analysis is updated and changed, the CRC should clearly inform the public of the change.
 - The CRC should consider avoiding live line-drawing when the CRC is under a tight deadline. During this redistricting cycle, the CRC was more productive when one or two Commissioners worked with mappers on potential proposals and presented the proposals to the full CRC for discussion.
 - The presence of the VRA counsel at all mapping meetings was vital. However, at times, it seemed as if the CRC could use VRA-related advice when counsel's assistance was not requested. Counsel should be more active regarding legal issues and less active in suggesting mapping configurations.
 - We believe mapping should begin earlier in the process. Failing to map early necessitates weeks of full-day meetings.
 - Also, we believe meetings that go late into the night have diminishing returns. They result in Commissioners losing concentration, having less productive conversations, and/or inappropriately accelerating decision-making.
 - After each drawing session, the CRC should consistently document line-drawing decisions and share the documents with the public. This will allow the CRC and public to remember why it made certain decisions in later discussions.

- For example, the CRC split the City of Carson at the Assembly level in order to draw the Los Angeles ports into separate districts. Days later, when advocates proposed a configuration that kept Carson whole while also keeping the two ports in their own Assembly districts, various Commissioners could not remember why Carson had been split. At least one Commissioner who had been absent when Carson was initially split expressed concern about uniting Carson because it might undo the reason it was split.
- The CRC should draw draft maps close to the deviation of the final maps. The deviation for the draft congressional map was so large that the draft map in certain regions could only be considered as vague sketches that needed significant amending or wholesale changes.
- While the CRC regularly posted the run of show for their mapping meetings, it rarely kept to the schedule. Towards the end of the process, the CRC often covered regions not posted in the day's run of show. We understand the need to be flexible because of time crunches and because changes in one region can affect changes in another. However, for the sake of the public, the CRC should either follow the run of show to the best of its abilities or tell the public early in the day that the CRC will not be following the schedule.
- We believe the CRC followed best practices by not using district numbers when line-drawing. Unfortunately, the district names used got confusing when the names no longer reflected the cities in the district, and the confusion was compounded when the names changed. We suggest using names that are less city or neighborhood specific to avoid the problem.

DELETE/ADD

- The CRC should allocate mapping discussion time based on population or complexity of a region. While focusing on sparsely populated regions, such as the wine country and eastern Sierra Nevada range, absolutely has its time and place, the CRC must not spend more time in sparsely populated areas to the detriment of large urban areas that are more complex to map.
- CRC made dramatic changes at the end in some regions and did not provide the public adequate opportunity to provide feedback on those changes. For example, the CRC made significant changes in the Senate map in the Bay Area on the last day of mapping. Although public comments were taken after the fact, the public was not able to provide input before the decision was essentially irreversible. Before any significant change is set, opportunities for public comment should be provided. This can be achieved by starting the mapping process earlier so as not to run up against the map certification deadline.
- The CRC should ask staff to provide summaries of public COI and map submissions in a region at the beginning of tackling that region, for the purpose of informing map iterations and live line-drawing discussions. The Commissioners should then summarize any additional factors they are considering in their mapping decisions.

Mapping Meetings - Public Input

KEEP/MODIFY

- We applaud the CRC for providing the public multiple ways to submit feedback regarding mapping proposals. There should always be a way to submit comments in writing and orally without attending a mapping session in person.
- The pandemic created unique opportunities for the CRC to experiment with virtual hearings and meetings. We believe the virtual mapping sessions increased the ability for the general public to participate. If virtual hearings and meetings are not permitted after the pandemic is over, we encourage the next CRC to develop a way for the public to monitor and submit comments remotely.
- We appreciate that a call-in process existed for the public to provide feedback on the various mapping proposals. We believe a call-in process is imperative to providing the public an opportunity to provide feedback to the CRC. However, the process could be improved.
 - As the CRC did toward the end of the mapping process, the CRC should publicize the time that the public comment lines will be open and for how long.
 - The public should not be made to wait for hours before the phone lines are open for the public comments period.
 - The process that existed did not notify callers if they successfully got in the queue. After pressing the appropriate code, the callers would hear silence. At the very least, the system should let callers know they are in the queue. The system should also give callers a sense of where they are in line when they call in.
 - Ideally, the CRC should create a process where callers can leave their number and get called back when they are in the front of the queue.
- The public comment sign-up process and availability of interpreter services were different at various times, which created confusion. For the scheduled draft maps feedback sessions, some organizations assisted community members by signing up using one organization's email address. Nothing in the sign-up process suggested this would not be allowed, yet those community members lost their appointments.
 - All sign-up rules should be clearly stated in the sign-up process.
 - The CRC should allow others to sign up for those without email addresses.
 - The appointment form should allow those who are signing up for others to indicate that they are signing up for a community member. The form should include whether the person making the appointment works for an organization, a political party, or a politician.
- While the Playbook attempted to address how to map a district with competing COIs, the CRC should not assume COI testimony can be quantified or totaled. Human judgment is an inevitable part of the process. However, in order to make it a transparent and fair judgment, the CRC should establish a framework early on for how it will consider and weigh COI testimony.

DELETE/ADD

- Often, a simple internet search of a regional newspaper revealed that callers were calling on behalf of an elected official or candidate. Future commissions should consider adopting systems that might help them figure out if a large number of callers are

surreptitiously asking the CRC to draft lines based on factors not allowed by the Voters First Act.

Finally, we have a few recommendations for your work during the balance of the 2021 CRC's term.

Ongoing Meetings, Staffing, and Responsibilities

Meetings

- We recommend the 2021 CRC continue to meet at least two times a year. Even if meetings use an in-person format for Commissioners, meetings should retain virtual participation options for the public.
- Travel costs should be considered when budgeting for meetings in future years.

Staffing

- The 2021 CRC should continue to employ staff with technical expertise to keep its website current and upgraded, and keep all materials available to the public, well-indexed, and searchable. Building the design and architecture of the website will require high-level capacity, at least in the short term.
 - Investing in this staff capacity will ensure transparency for and accountability to the public and ensure compliance with state open record laws.
- The 2021 CRC should maintain administrative support to manage logistics, schedule meetings, direct press inquiries to Commissioners, and so on.
- Late in the decade, the CRC should be equipped with multiple outreach staffers, to prepare for and publicize the next commission, to encourage interest in the application process, and to build partnerships with stakeholders and organizations invested in the 2031 CRC's success.

Responsibilities

- Our view is that advocating for independent commissions in other states and in localities around California would be a valuable use of the Commissioners' volunteer time but should not be supported through state funds.
 - State funds should go directly to the state redistricting process.
- The State should support the 2021 Commissioners outreach around and promotion of the 2031 CRC and should resource the 2021 Commissioners work to encourage new Commissioner applications. We believe the 2021 CRC should be given a very robust budget for these purposes.